

The Honorable Thomas S. Zilly

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

SCOTTSDALE INSURANCE COMPANY

Plaintiff,

vs.

AMERICAN MANAGEMENT SERVICES EAST,
LLC, AMERICAN MANAGEMENT SERVICES
CALIFORNIA, LLC, AMERICAN MANAGEMENT
SERVICES, LLC, DBA PINNACLE BELVOIR LLC,
PINNACLE BELVOIR LLC, PINNACLE
MONTEREY, LLC, PINNACLE IRWIN, LLC, GFS
RISK, LLC, GOODMAN REAL ESTATE, INC.,
GOODMAN FINANCIAL SERVICES, INC., JOHN
GOODMAN, and STANLEY HARRELSON,

Defendants.

Case No. 2:15-cv-1000-TSZ

DEFENDANTS' RESPONSE TO
PLAINTIFF'S MOTION FOR
SUMMARY JUDGMENT

ORAL ARGUMENT REQUESTED

NOTE ON MOTION CALENDAR:
DECEMBER 18, 2015

In an effort to avoid redundancy, defendants respond in opposition to plaintiff Scottsdale Insurance Company's motion for summary judgment (ECF 31) filed in this case by incorporating by reference for all purposes "Plaintiffs' Response to Defendants' Cross-Motions for Summary Judgment" filed in the companion matter to this case, which is captioned *American Management Services East, LLC, et al. v. Scottsdale Insurance Co., et al.*, United States District Court for the

1 Western District of Washington, Case No. 2:15-cv-01004-TSZ.

2 For the reasons stated therein, defendants in this case respectfully request that the Court
3 deny Scottsdale's motion for summary judgment on the duty to defend.

4 Dated this 11th day of December, 2015.

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CERTIFICATE OF SERVICE

I hereby certify that I served a full, true and correct copy of the foregoing
DEFENDANTS' RESPONSE TO PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT by:

- ☐ U.S. Postal Service
☒ Electronically, utilizing CM/ECF
☐ Facsimile
☐ Arranging for hand delivery [as indicated]
☐ Overnight mail
☐ Electronic mail, via Outlook

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DATED: December 11, 2015 BALL JANIK LLP

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